

FILED

JAN - 9 2007

CLERK, U.S. DISTRICT COURT

By

Deputy

United States District Court

NORTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

TRICIA ANN JOHNSON

CRIMINAL COMPLAINT

CASE NUMBER: 3-07-MJ-4

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 6, 2007 in Dallas County, in the Northern District of Texas defendant(s) did,

knowingly sell, transfer, and deliver false, forged counterfeited, and altered obligations of the United States, with the intent that the counterfeit be passed, published, and used as true and genuine; to wit, approximately \$350.00 in \$50.00 counterfeit Federal Reserve Notes, each purportedly drawn on a Federal Reserve Bank, which defendant knew to be counterfeit,

in violation of Title 18, United States Code, Section(s) 473.

I further state that I am a(n) Special Agent with the U.S. Secret Service and that this complaint is based on the following facts:

See attached Affidavit of Special Agent, Ryan Y. Nordyke, U.S. Secret Service, which is incorporated and made a part hereof by reference.

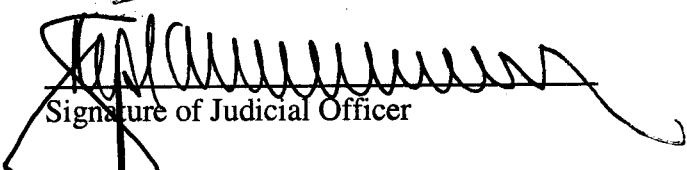
Continued on the attached sheet and made a part hereof: X Yes No



Signature of Complainant
RYAN Y. NORDYKE
Special Agent, USSS

Sworn to before me and subscribed in my presence, on this 9th day of January, 2007, at Dallas, Texas.

JEFF KAPLAN
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, Ryan Y. Nordyke, having been duly sworn, depose and state the following, which I believe to be true and correct to the best of my knowledge:

1. On January 6, 2007, the defendant, Tricia Ann Johnson, did knowingly sell, transfer, and deliver false, forged, counterfeited, and altered obligations of the United States, with the intent that the counterfeit be passed, published, and used as true and genuine, to wit, approximately \$350.00 in \$50.00 counterfeit Federal Reserve Notes (FRN), each purportedly drawn on a Federal Reserve Bank, which defendant knew to be counterfeit, in violation of 18 U.S.C § 473, that is dealing in counterfeit securities or obligations of the United States.

2. Affiant is currently employed as a Special Agent with the United States Secret Service (USSS) and have been so employed for approximately one year. As such, I am currently assigned to the counterfeit squad in the USSS's Dallas Field Office. My duties include investigating counterfeit currency cases. I have received training in the detection and identification of counterfeit currency from the USSS in 2005. I make this Affidavit in support of the issuance of a complaint and application for an arrest warrant.

3. This investigation began on December 28, 2006, when members of the Rowlett Police Department contacted our office regarding the arrest of an individual for forgery of a financial instrument in violation of Texas Penal Code section 32.21.

4. As a result, the next day I met with the suspect for an interview. During the interview, the suspect stated that he/she received the counterfeit note from Tricia Ann Johnson at her residence located at 3629 Bahamas Drive, in Mesquite, Texas. In so doing, the suspect also stated that Johnson had given him/her and others counterfeit currency to buy small items and took a percentage of the genuine currency obtained from those transactions. The suspect admitted to passing counterfeit currency for Johnson on at least seven previous occasions. At the conclusion of the interview, the suspect agreed to assist the government by acting as a "Confidential Informant" ("CI1").

5. On January 3, 2007, I interviewed a second individual who stated that he/she knew Johnson and that she was also selling methamphetamine out of her home in Mesquite, Texas. At the conclusion of the interview CI2 identified Johnson in a Texas Department of Public Safety driver's license photograph previously obtained by members of the USSS.

6. On January 4, 2007, I went to the location previously described by CI1 and confirmed it being the residence of Johnson. Upon arrival, I noted a white house, with the right front window blacked out, and a Red Pontiac Sunfire bearing the Texas license plate number J79YRK parked in the driveway. A computer check of the Sunfire's licence revealed that the car was registered to "Tricia A. Johnson" at the above listed address. An Accurint inquiry also confirmed that "Tricia A. Johnson" owned the house.

7. On January 6, 2007, CI1 told me that earlier that day, Tricia Ann Johnson had called him/her via cell phone and told him/her that she had money ready to pick up from her residence. During the call the CI1 told Johnson that he/she would meet her at 6:00pm at her residence.

8. Prior to the 6:00 p.m. pick-up, I along with other members of the USSS, and Dallas County Investigator Grant Jack met with the CI1. During our meeting, CI1 was situated with a body wire, a recording device, and \$50.00 of genuine currency. After confirming that CI1 did not have any other money or contrband, he/she was driven to Johnson's residence by an undercover agent . Surviellance members watched and listened as CI1 entered the residence and purchased \$350.00 counterfeit currency for \$50.00 genuine currency. At the conclusion of the operation, the money was turned over to me. Upon inspecting the money I

determined it to be counterfeit currency. When we returned to the Dallas Field Office, CI1 confirmed that Johnson was the person who given him/her the counterfeit currency by positively identifying her in a Texas Department of Public Safety driver's license photo previously obtained by members of the USSS.

9. Based on the foregoing information, as well as my previous training and experience, I believe there is probable cause to believe that on January 6, 2007, Tricia Ann Johnson did knowingly sell, transfer, and deliver false, forged, counterfeited, and altered obligations of the United States, to a person known to law enforcement officials, with the intent that the counterfeit be passed, published, and used as true and genuine, which defendant knew to be counterfeit, in violation of 18 U.S.C § 473.



Ryan Y. Nordyke
Special Agent
United States Secret Service

Subscribed and sworn to before me this 9 day of January, 2007.




UNITED STATES MAGISTRATE JUDGE
JEFF KAPLAN